## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Staci Ann Kuhns AKA Stacey A. Kuhns, Stacie A. Kuhns, DBA Staci's Cookies, Cakes and Catering Derrik Anthony Kuhns AKA Derrick A. Kuhns, Derrik A. Kuhas

Debtor

PNC BANK, NATIONAL ASSOCIATION, SUCCESSOR BY MERGER TO NATIONAL CITY MORTGAGE, A DIVISION OF NATIONAL CITY BANK, its successors and/or assigns

Movant

v.

Staci Ann Kuhns AKA Stacey A. Kuhns, Stacie A. Kuhns, DBA Staci's Cookies, Cakes and Catering Derrik Anthony Kuhns AKA Derrick A. Kuhns, Derrik A. Kuhas Respondent

and

Ronda J. Winnecour, Trustee

Additional Respondent

BK. NO. 16-21971 GLT

CHAPTER 13

NOTICE OF HEARING WITH RESPONSE DEADLINE
ON MOTION OF PNC BANK, NATIONAL ASSOCIATION, SUCCESSOR BY MERGER TO
NATIONAL CITY MORTGAGE, A DIVISION OF NATIONAL CITY BANK, ITS
SUCCESSORS AND/OR ASSIGNS
FOR RELIEF FROM THE AUTOMATIC STAY

## TO THE RESPONDENTS:

You are hereby notified that the above Movant seeks an Order affecting your rights or property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movant, a response to the motion no later than September 5, 2017, (seventeen (17) calendar days after the date of service below) in accordance with Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this court, and the procedures of the Presiding Judge as found on the Judge's web page at <a href="www.pawb.uscourts.gov">www.pawb.uscourts.gov</a>. If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

You should take this to your lawyer at once.

A hearing will be held on October 4, 2017 at 9:30 **AM** before Judge **Gregory L. Taddonio** in Court Room A, 54<sup>th</sup> Floor, U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Only a limited time of 15 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Court. An order granting the relief sought may be entered and the hearing may not be held it you do not timely file and serve a response.

Date of Mailing or other service August 18, 2017

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire jwarmbrodt@kmllawgroup.com Attorney I.D. No. 42524 KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106 Phone: 412-430-3594

Attorney for Movant/Applicant